



March 31, 2014

Reviewing Officer, Pacific Northwest Region
USDA Forest Service
Attn. 1570 Appeals and Objections
PO Box 3623
Portland, OR 97208-3623

RE: Rocket Vegetation Management Project Objection

VIA email: *objections-pnw-regional-office@fs.fed.us*

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files this objection to the proposed decision for the Rocket Vegetation Management Project. Deschutes National Forest Supervisor John Allen is the responsible official. The Rocket project occurs on the Bend-Fort Rock Ranger District.

Objector

American Forest Resource Council
5100 SW Macadam, Suite 350
Portland, Oregon 97239
(503) 222-9505

Appellant's Designated Representative:

Irene Jerome
AFRC Representative, Eastern Oregon/SW Idaho
408 SE Hillcrest Rd
John Day, OR 97845
(541) 620-4466
ijeromeafrc@centurytel.net

Reasons for the Objection

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the draft EA which are hereby incorporated by reference.

5100 S.W. Macadam Avenue, Suite 350
Portland, Oregon 97239
Tel. (503) 222-9505 • Fax (503) 222-3255

The Decision Makers modifications to the Alternative 4, the preferred alternative, are not analyzed to determine effects.

1. The Decision Maker has selected Alternative 4 with modifications as the preferred alternative. The modifications have compromised Alternative 4 in such a manner that it no longer adequately meets the Purpose and Need of the Project.

Specific changes made to the selected alternative since the draft environmental assessment comment period include addition of “10 percent retention patches to be distributed across units in the treated areas which will contribute to cover and more structural diversity”. What is being retained? Will this “retention” be 10 percent of the acreage? Or 10 percent of the stems? Or 10 percent of cubic volume of the material? Or 10 percent of the merchantable volume? What is the purpose of implementing this additional step when a complex system of variable thinning is already planned? It would seem that the initial prescription of variable density thinning should more than suffice to provide the “clumpy and gappy” condition. Further, where is the analysis of the effects of leaving the additional 10 percent of whatever is being retained? How does this affect the economic analysis? The estimates of ccf? The estimates of mmbf? The jobs maintained? There are 32 units prescribing commercial thinning that are less than or equal to five acres in size. The equipment used to cost-effectively treat these types of projects generally requires investments in excess of \$1,000,000. Numerous treatment units with very small acreages result in excessive movement of equipment and a resulting loss of productivity – that is moving logs down the road. And now an additional 10 percent of something is being retained which will further reduce productivity. Numerous units are only one acre in size – an area that is 208 feet by 208 feet. AFRC questions the logic of this approach.

In its comments on the draft Rocket EA, AFRC requested that commercial thinning be from both “above and below,” (rather than strictly thinning from below as is the common practice), to enhance both horizontal and vertical diversity. Thinning from above and below also provides a broader range of forest products to the local infrastructure and allows for more flexibility and better silviculture in the field. The Forest Service response to the AFRC comment that was “clumpy and gappy” conditions would suffice for the structural diversity. This is an inadequate response. The variable density thinning prescriptions in Alternative 4 call for the lowest basal areas in the areas with the smallest average dbh. As the average dbh increases so do the leave tree basal area requirements. AFRC requested that in all areas a variable thinning prescription selecting trees from all age and diameter classes be selected to provide diversity on the landscape.

2. Two opening units within NNVM are reduced from 3 and 4 acres to 2.5 acres each. “Based on scoping comments from the Oregon Department of Fish and Wildlife (ODFW), additional openings were proposed in Alternative 4. ODFW referenced the Fire Learning Network historic range of variability where 25% of the dry ponderosa pine plant associations were in early seral conditions (EA p. 119, Table 43). Alternative 4 will create a total of 11 openings that will range in size from 2.5 acres to 12 acres.” (Decision Notice p. 4)

Input from state wildlife expert's state that early seral openings are extremely important to deer population viability. Reducing the size of these openings is not acceptable.

3. In the draft EA, AFRC asked if consideration was given to cutting "lodgepole" pine equal to or greater than 21 inches dbh. This was an inadvertent mistake and the intent was to ask if the Forest Service considered cutting "ponderosa" pine in excess of 21 inches at dbh. This question is especially relevant in the areas where dwarf mistletoe is so severe that the prescription is to "girdle" trees greater than 21 inches to induce mortality and simultaneously limit the spread of mistletoe. Rather than unilaterally inducing mortality in all trees greater than 21 inches dbh it would much better serve the greater good if trees (in the upper diameter classes both greater than and less than 21 inches at dbh) heavily infected with mistletoe that exhibited especially desirable characteristics for wildlife such as crooks, sweep, heavy limbs, trunk rot, etc. were girdled for snags and other wildlife benefits. A forest plan amendment should be requested to cut trees greater than 21 inches dbh and those trees along with others that provide higher value for industrial purposes, should be removed. This solution provides the proverbial "win-win" by limiting the spread of mistletoe, providing highly desirable trees for wildlife, and by providing desirable trees for the forest products industry.

Resolution Requested

AFRC requests that the modification of adding ten percent retention patches be dropped and that the openings in the early seral units in the NNVM be left at the original size without any acreage reductions, per the guidance from wildlife experts at ODFW. AFRC requests that a forest plan amendment be requested to cut and remove trees equal to or greater than 21 inches dbh in areas of heavy mistletoe, with appropriate evaluation to girdle and leave trees most suitable for a variety wildlife species.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objector requests to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. If more than one objection is received, AFRC requests that a joint meeting of all objectors be scheduled to allow for efficient and transparent resolution.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Partin", with a stylized flourish at the end.

Tom Partin
President